

**BOIES SCHILLER FLEXNER LLP**

Mark C. Mao (CA Bar No. 236165)  
[mmao@bsflp.com](mailto:mmao@bsflp.com)  
Beko Reblitz-Richardson (CA Bar No. 238027)  
[brichardson@bsflp.com](mailto:brichardson@bsflp.com)  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 293 6858  
Fax: (415) 999 9695

**SUSMAN GODFREY L.L.P.**

William Christopher Carmody (pro hac vice)  
[bcarmody@susmangodfrey.com](mailto:bcarmody@susmangodfrey.com)  
Shawn J. Rabin (pro hac vice)  
[srabin@susmangodfrey.com](mailto:srabin@susmangodfrey.com)  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Telephone: (212) 336-8330

**MORGAN & MORGAN**

John A. Yanchunis (pro hac vice)  
[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)  
Ryan J. McGee (pro hac vice)  
[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)  
201 N. Franklin Street, 7th Floor  
Tampa, FL 33602  
Telephone: (813) 223-5505

*Counsel for Plaintiffs; additional counsel  
listed in signature blocks below*

**QUINN EMANUEL URQUHART &  
SULLIVAN, LLP**

Andrew H. Schapiro (admitted *pro hac vice*)  
[andrewschapiro@quinnemanuel.com](mailto:andrewschapiro@quinnemanuel.com)  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel: (312) 705-7400  
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
[stephenbroome@quinnemanuel.com](mailto:stephenbroome@quinnemanuel.com)  
Viola Trebicka (CA Bar No. 269526)  
[violatrebicka@quinnemanuel.com](mailto:violatrebicka@quinnemanuel.com)  
865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Tel: (213) 443-3000  
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)  
[dianedoolittle@quinnemanuel.com](mailto:dianedoolittle@quinnemanuel.com)  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

*Counsel for Defendant; additional counsel  
listed in signature blocks below*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, MONIQUE  
TRUJILLO, WILLIAM BYATT, JEREMY  
DAVIS, and CHRISTOPHER CASTILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**JOINT STIPULATION AND [PROPOSED]  
ORDER EXTENDING TIME FOR  
GOOGLE TO SUBMIT DECLARATION  
IN SUPPORT OF PLAINTIFFS' MOTION  
TO SEAL (DKT. 608)**

Judge: Hon. Yvonne Gonzalez Rogers

Pursuant to Civil Local Rule 6-2 and 7-12, this joint stipulation is entered into between Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

WHEREAS, on June 21, 2022, Plaintiffs filed their Administrative Motion to File Under Seal Portions of Plaintiffs’ Motion for Class Certification (“Motion to Seal”) (Dkt. 608);

WHEREAS, on June 21, 2022, Google received unredacted copies of Plaintiffs’ Motion to Seal and exhibits, approximately 90 of which contain material designated “Confidential” or “Highly Confidential – Attorneys’ Eyes Only” by Google to be sealed and submitted with Dkt. 608;

WHEREAS, pursuant to Civil Local Rule 79-5(e), the deadline for Google, as the Designating Party to portions of Plaintiffs’ Motion to Seal (Dkt. 608), to establish that such designated material is sealable, is Monday, June 27, 2022;

WHEREAS, the Parties agree that an extension of the deadline to Wednesday, July 27, 2022 will provide Google with sufficient time to respond to Plaintiffs’ Motion to Seal (Dkt. 608)

NOW THEREFORE, the Parties stipulate to extend the deadline by which Google shall submit a Declaration in support of Plaintiffs’ Motion to Seal (Dkt. 608), to Wednesday, July 27, 2022.

DATED: June 27, 2022

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

/s/ Andrew H. Schapiro

Andrew H. Schapiro (admitted *pro hac vice*)  
[andrewschapiro@quinnemanuel.com](mailto:andrewschapiro@quinnemanuel.com)  
Teuta Fani (admitted *pro hac vice*)  
[teutafani@quinnemanuel.com](mailto:teutafani@quinnemanuel.com)  
191 N. Wacker Drive, Suite 2700  
Chicago, IL 60606  
Tel: (312) 705-7400  
Fax: (312) 705-7401

Stephen A. Broome (CA Bar No. 314605)  
[sb@quinnemanuel.com](mailto:sb@quinnemanuel.com)  
Viola Trebicka (CA Bar No. 269526)  
[violatrebicka@quinnemanuel.com](mailto:violatrebicka@quinnemanuel.com)  
Crystal Nix-Hines (Bar No. 326971)  
[crystalnixhines@quinnemanuel.com](mailto:crystalnixhines@quinnemanuel.com)  
Alyssa G. Olson (CA Bar No. 305705)  
[alyolson@quinnemanuel.com](mailto:alyolson@quinnemanuel.com)

BOIES SCHILLER FLEXNER LLP

/s/ Mark Mao

Mark C. Mao (CA Bar No. 236165)  
[mmao@bsflp.com](mailto:mmao@bsflp.com)  
Beko Reblitz-Richardson (CA Bar No. 238027)  
[brichardson@bsflp.com](mailto:brichardson@bsflp.com)  
44 Montgomery Street, 41<sup>st</sup> Floor  
San Francisco, CA 94104  
Tel: (415) 293 6858  
Fax: (415) 999 9695

James W. Lee (*pro hac vice*)  
[jlee@bsflp.com](mailto:jlee@bsflp.com)  
Rossana Baeza (*pro hac vice*)  
[rbaeza@bsflp.com](mailto:rbaeza@bsflp.com)  
100 SE 2<sup>nd</sup> Street, Suite 2800  
Miami, FL 33130  
Tel: (305) 539-8400  
Fax: (305) 539-1304

865 S. Figueroa Street, 10th Floor  
Los Angeles, CA 90017  
Tel: (213) 443-3000  
Fax: (213) 443-3100

Diane M. Doolittle (CA Bar No. 142046)  
[dianedoolittle@quinnemanuel.com](mailto:dianedoolittle@quinnemanuel.com)  
Sara Jenkins (CA Bar No. 230097)  
[sarajenkins@quinnemanuel.com](mailto:sarajenkins@quinnemanuel.com)  
555 Twin Dolphin Drive, 5th Floor  
Redwood Shores, CA 94065  
Telephone: (650) 801-5000  
Facsimile: (650) 801-5100

Jomaire A. Crawford (admitted *pro hac vice*)  
[jomairecrawford@quinnemanuel.com](mailto:jomairecrawford@quinnemanuel.com)  
51 Madison Avenue, 22nd Floor  
New York, NY 10010  
Telephone: (212) 849-7000  
Facsimile: (212) 849-7100

Josef Ansorge (admitted *pro hac vice*)  
[josefansorge@quinnemanuel.com](mailto:josefansorge@quinnemanuel.com)  
1300 I Street NW, Suite 900  
Carl Spilly (admitted *pro hac vice*)  
[carlspilly@quinnemanuel.com](mailto:carlspilly@quinnemanuel.com)  
Xi ("Tracy") Gao (CA Bar No. 326266)  
[tracygao@quinnemanuel.com](mailto:tracygao@quinnemanuel.com)  
Washington D.C., 20005  
Tel: (202) 538-8000  
Fax: (202) 538-8100

Jonathan Tse (CA Bar No. 305468)  
[jonathantse@quinnemanuel.com](mailto:jonathantse@quinnemanuel.com)  
50 California Street, 22nd Floor  
San Francisco, CA 94111  
Tel: (415) 875-6600  
Fax: (415) 875-6700

*Attorneys for Defendant Google LLC*

William Christopher Carmody (*pro hac vice*)  
[bcarmody@susmangodfrey.com](mailto:bcarmody@susmangodfrey.com)  
Shawn J. Rabin (*pro hac vice*)  
[srabin@susmangodfrey.com](mailto:srabin@susmangodfrey.com)  
Steven Shepard (*pro hac vice*)  
[sshepard@susmangodfrey.com](mailto:sshepard@susmangodfrey.com)  
Alexander P. Frawley (*pro hac vice*)  
[afrawley@susmangodfrey.com](mailto:afrawley@susmangodfrey.com)  
SUSMAN GODFREY L.L.P.  
1301 Avenue of the Americas, 32nd Floor  
New York, NY 10019  
Tel: (212) 336-8330

Amanda Bonn (CA Bar No. 270891)  
[abonn@susmangodfrey.com](mailto:abonn@susmangodfrey.com)  
SUSMAN GODFREY L.L.P.  
1900 Avenue of the Stars, Suite 1400  
Los Angeles, CA 90067  
Tel: (310) 789-3100

John A. Yanchunis (*pro hac vice*)  
[jyanchunis@forthepeople.com](mailto:jyanchunis@forthepeople.com)  
Ryan J. McGee (*pro hac vice*)  
[rmcgee@forthepeople.com](mailto:rmcgee@forthepeople.com)  
MORGAN & MORGAN, P.A.  
201 N Franklin Street, 7th Floor  
Tampa, FL 33602  
Tel: (813) 223-5505  
Fax: (813) 222-4736

Michael F. Ram (CA Bar No. 104805)  
[mram@forthepeople.com](mailto:mram@forthepeople.com)  
MORGAN & MORGAN, P.A.  
711 Van Ness Avenue, Suite 500  
San Francisco, CA 94102  
Tel: (415) 358-6913

*Attorneys for Plaintiffs*

**ATTESTATION OF CONCURRENCE**

I am the ECF user whose ID and password are being used to file this JOINT STIPULATION AND [PROPOSED] ORDER EXTENDING TIME FOR GOOGLE TO SUBMIT DECLARATION IN SUPPORT OF PLAINTIFFS' MOTION TO SEAL (DKT. 608). Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: June 27, 2022

By /s/ Andrew H. Schapiro  
Andrew H. Schapiro  
*Counsel on behalf of Google*

**[PROPOSED] ORDER**

Pursuant to stipulation of the Parties, the Court hereby **ORDERS:**

The deadline for Google to submit a Declaration in support of Plaintiffs' Motion to Seal (Dkt. 608), shall be extended to July 27, 2022.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HON. YVONNE GONZALEZ ROGERS  
United States District Court Judge